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R1807003

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Subject: [EXTERNAL] R.18-07-003, Rulemaking 18-07-003, Track 1 Extension Request for Individual IOU Confidential Submittals
Date: Friday, April 15, 2022 2:59:22 PM

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Dear Administrative Law Judges Atamturk and Lakhanpal,

On April 11, 2022 the California Public Utilities Commission (Commission) issued an Assigned Commissioner And Assigned Administrative Law Judge's Ruling Identifying Issues And Schedule Of Review For 2022 Renewables Portfolio Standard Procurement Plans and Denying Joint IOUs' Motion to File Advice Letters for Market Offer Process (the 2022 RPS Plan Ruling) in Rulemaking 18-07-003.

Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company (collectively, the Joint IOUs), have reviewed the proposed schedule and requirements associated with the 2022 RPS Plan Ruling. In the 2022 RPS Plan Ruling, the Joint IOUs are ordered to jointly file a proposed Market Offer process as part of Track 1 of the 2022 Renewables Portfolio Standard Procurement Plan pursuant to Decision (D.) 21-05-030. The 2022 RPS Plan Ruling clarifies that the proposed Market Offer process should:

- (a) be based upon existing rules and requirements for IOU RPS solicitations previously approved in the RPS Proceeding,
- (b) include rules for IOU participation in IOU-administered solicitations, and
- (c) propose how to allocate sales revenues.

The Joint IOUs recognize that any filing proposing a Market Offer process based upon existing rules and requirements for IOU RPS solicitations previously approved in the RPS proceeding will contain market sensitive information. For example, PG&E's RPS Sales Strategy contains a confidential information for its REC sales solicitations that the Commission routinely approves as part of its RPS Plan (See, e.g., D.21-01-005, p. Conclusion of Law 5; D. 22-01-004, Conclusion of Law 11). The Joint IOUs do not interpret the 2022 RPS Plan Ruling or D. 21-05-030 to permit the Joint IOUs coordinate or exchange any such market sensitive information as part a Joint Filing. Moreover, a joint submittal of confidential information presents a risk that IOUs may gain a competitive advantage in their potential participation in any IOU Market Offer process. Granting a brief extension to allow the separate, confidential submissions of the Joint IOUs' respective confidential plans will increase the likelihood of a robust Market Offer process . Allowing the separate, confidential submissions of the Joint IOUs' respective confidential plans will eliminate the risk of potential anticompetitive information sharing.

In our view, each IOU should be provided an opportunity to separately develop and submit confidential market sensitive Market Offer Sales Strategies following the submission of the Jointly Filed Market Offer

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Process proposed on May 2, 2022. Because any market sensitive information submitted to support the Market Offer Process should be informed by the final, public Market Offer proposal, the Joint IOUs request a short extension to separately develop any IOU-specific market sensitive Market Offer strategies and to separately file motions for leave to submit any market sensitive Market Offer strategies developed by an IOU.

The Joint IOUs therefore have developed the following modified schedule associated with the Track 1 components of the 2022 RPS Plan Ruling that would enable the Joint IOUs to separately develop and separately file Confidential Market Offer Sales Strategies to be considered as part of the Commission's Track 1 Decision:

Process Details	2022 RPS Plan Ruling Date	Proposed Revised Date
Track 1 – IOUs jointly file Market Offer process as part of VAMO pursuant to D.21-05-030	May 2, 2022	No Change
Track 1 – IOUs separately file Confidential Market Offer Strategies Supporting Market Offer process as part of VAMO pursuant to D.21-05-030 ; and separate Motions to Leave to File Under Seal such Confidential Market Offer Strategies	N/A	May 16
Track 1 – Comments on Market Offer Process	20 days from the Joint IOU proposal on Track 1 Market Offer Process	20 days from the date the IOUs' Confidential Market Offer Strategies are filed
Track 1 – Reply Comments	Within 5 days after the last day for filing comments	Within 5 days after the last day for filing comments
Track 1 – Proposed Decision on Market Offer Process	Quarter 3, 2022	No change

Pursuant to the requirements set forth in Rule 11.6, the Joint IOUs made a good-faith effort to ask all other parties to the proceeding to agree to the extension by sending an e-mail to the R.18-07-003 service list on Thursday, April 14 2022. The email contained proposed revised dates and requested that any feedback be provided by noon Friday, April 15. In response to the e-mail, PG&E received the following feedback:

- Small Business Utility Associates ("SBUA") communicated that SBUA has no objections to the proposed extension; and
- The Commission's Public Advocates Office ("Cal Advocates") communicated support for the Joint IOUs' extension request on the condition that comments on the Market Offer Process be due 20 days after the IOUs' confidential filing to allow parties the same comment period that was ordered in the 2022 RPS Plan Ruling

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In response to Cal Advocates' feedback, the Joint IOUs' proposed schedule is updated to reflect a comment date of 20 days from the individual IOU confidential filings on the Market Offer Process, instead of the Joint IOU initial proposal of "31 days from the Joint IOU Proposal on Track 1 Market Offer Processes."

Based on these responses, the Joint IOUs represent to the Commission that no party opposed the Joint IOUs' extension request, and Joint IOUs' proposed schedule was modified to accommodate Cal Advocate's conditional support of the extension request.

I have been authorized by counsel for SCE and SDG&E to make this request on their behalf. The Joint IOUs appreciate your consideration of this request.

Thank you,
Maria V. Wilson
maria.wilson@pge.com
(415) 732-9883

Geri Wesley, on behalf of
Maria V. Wilson
Pacific Gas and Electric Company

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(END OF ATTACHMENT)